

**FILED
IN CLERK'S OFFICE
US DISTRICT COURT
E.D.N.Y.
* JUNE 24, 2024 *
BROOKLYN OFFICE**

KTF:KPO
F. #2024R00123

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

MICHAEL CLARK,
also known as
"MoscatoMurda,"
KEWAN BUTTS,
also known as "Kash
Mula,"
JASON DALE,
also known as "Smurda
Murda,"

Cr. No. 24-CR-262
(T. 18, U.S.C., §§ 981(a)(1)(C),
1201(a)(1), 1201(c), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c)))

**Judge Nina R. Morrison
Magistrate Judge Peggy Kuo**

BRANDON PATTERSON,
also known as "Koke
KashMoney,"

ALLAH WALKER,

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Kidnapping Conspiracy)

1. In or about January 2024, within the Eastern District of New York and elsewhere, the defendants MICHAEL CLARK, also known as "MoscatoMurda," KEWAN BUTTS, also known as "Kash Mula," JASON DALE, also known as "Smurda Murda,"

BRANDON

PATTERSON, also known as “Koke KashMoney,”

and ALLAH WALKER, together with others, did knowingly and intentionally conspire to seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe-1, an individual whose identity is known to the Grand Jury, and use one or more means, facilities and instrumentalities of interstate and foreign commerce, to wit: cellular telephones and the internet, in committing and in furtherance of the commission of the offense.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants MICHAEL CLARK, also known as "MoscatoMurda," KEWAN BUTTS, also known as "Kash Mula," JASON DALE, also known as "Smurda Murda," [REDACTED]

BRANDON PATTERSON, also known as “Koke KashMoney,”

_____ and ALLAH WALKER, together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

(a) On or about January 24, 2024, CLARK used a cellular telephone to lure John Doe-1 to a house located on Benziger Avenue in Staten Island, New York (the “Benziger House”).

(b) On or about January 24, 2024, [REDACTED] communicated about kidnapping and assaulting John Doe-1 using cellular telephones.

(c) On or about January 24, 2024, while John Doe-1 was restrained at the Benziger House, CLARK and DALE stabbed John Doe-1 with a knife.

(d) On or about January 24, 2024, while John Doe-1 was restrained at the Benziger House, [REDACTED] knocked out some of John Doe-1's teeth with a firearm.

(e) On or about January 24, 2024, while John Doe-1 was restrained at the Benziger House, BUTTS, [REDACTED] and WALKER held John Doe-1 at the Benziger House for several hours.

(f) On or about January 24, 2024, CLARK and [REDACTED] together with others, threatened to kill John Doe-1 while John Doe-1 was inside the Benziger House.

(g) On or about January 24, 2024, CLARK, BUTTS, [REDACTED] and [REDACTED] together with others, took personal items and business proceeds from John Doe-1's home in New Jersey.

(h) On or about January 24, 2024, while CLARK, BUTTS, [REDACTED] robbed John Doe-1's home, DALE, [REDACTED] and PATTERSON, together with others, held John Doe-1 at the Benziger House.

(Title 18, United States Code, Sections 1201(c) and 3551 et seq.)

COUNT TWO
(Kidnapping)

3. On or about January 24, 2024, within the Eastern District of New York and elsewhere, the defendants MICHAEL CLARK, also known as "MoscatoMurda," [REDACTED] [REDACTED] together with others, did knowingly and intentionally seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe-1, an individual whose identity is known to the Grand Jury, and use one or more means, facilities and

instrumentalities of interstate and foreign commerce, to wit: cellular telephones, in committing and in furtherance of the commission of the offense.

(Title 18, United States Code, Sections 1201(a)(1), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendants that, upon their conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

By Carolyn Pokorny, Assistant US Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

1. The defendant is a person who is
2. a member of the same family as the
3. person who is the subject of the
4. investigation.

5. The defendant is a person who is
6. a member of the same family as the
7. person who is the subject of the
8. investigation.

9. The defendant is a person who is
10. a member of the same family as the
11. person who is the subject of the
12. investigation.

13. The defendant is a person who is
14. a member of the same family as the
15. person who is the subject of the
16. investigation.